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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10, SEATTLE, WA 98101

DATE: DEC 05 1984

SUBJECT: Dioxin Tier 2A Sites

FROM: Lori Cohen *Lori Cohen*  
Superfund Branch

TO: Addressees

The purpose of this memo is to answer some questions raised at our November 27, 1984 meeting in regard to the five sites that are ranked as Tier 2a in the National Dioxin Strategy. There were three important questions raised; these are listed below and answered. Then I briefly mention the next steps I'd like to see E & E take in this project.

1. Two of the Tier 2a sites, Chemical Securities System, Inc (CSSI) and Envirosafe (ESII) are hazardous waste landfills that are currently being permitted under the RCRA program. Should these facilities be handled differently than the other 2a sites, and if so how?

Answer: Yes. These 2a sites should be handled differently from the others. I have confirmed with EPA Headquarters that the intent of the dioxin strategy is not to determine how much dioxin is present at these sites. Instead, our first step will be to determine from records if dioxin is present, and if so, whether it is causing a threat to public health and the environment. E & E should review existing data, and develop a plan for sampling (if necessary) using existing wells if possible, etc. If a problem is found RCRA/CERCLA action will be taken to correct the problem.

The second step to our approach will be to establish means to ensure that any future contamination is found early (e.g. through RCRA permit monitoring reqts.) and corrected. E & E should make a recommendation to EPA as to what requirements are appropriate as part of the RCRA permit.

2. How should the other landfills be handled?

Answer: The best way to approach these sites is to think in terms of a "screening test" to determine if Superfund activity is appropriate at the site(s). Information from the initial screen should provide enough data to determine if emergency or remedial action should be taken under CERCLA.

Each site will be handled slightly differently -- we will leave it to E&E to come up with a logical, phased approach to determine if there is dioxin contamination at each site, where the contaminated materials are most likely located and what sampling is appropriate on or off site to assess the nature of the potential threat to human health and the environment.



2.

3. Does the 2A study include the Envirosafe site at Bruneau, Idaho?

Answer: This site does not fall under the scope of work for the Tier 2a sites. Apparently, the RCRA program is doing some work at this site -- I will follow-up with Hofer/Rice re: dioxin monitoring at the site. E&E should not work on this site.

Next Steps

- E&E should continue work as scheduled and plan for a pre-Xmas meeting to discuss a general sampling approach for at least three sites. They should work with the state agencies and other organizations as needed.

- E&E should begin work with EPA RCRA program staff on ESII and CSSI. Bob Stammes and Paul Day are the EPA contacts for those sites, respectively. I would like to attend initial meetings for these sites.

Please let me know if there are further questions.

Addresses:

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